

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Civil Action No.
03 MDL 1570 (GBD)(FM)

This document relates to:

Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-9849 (GBD)(SN)

**DECLARATION OF JOHN C. DUANE IN SUPPORT OF PLAINTIFFS' MOTION TO
ADD PARTIES AGAINST THE TALIBAN**

JOHN C. DUANE, Esquire, hereby states under penalty of perjury that:

1. I am an attorney with the law firm of Motley Rice LLC, attorneys for the Plaintiffs in the above-captioned matter. I submit this Declaration in support of Plaintiffs' Motion to Add Parties Against the Taliban in the action titled *Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03-cv-9849 (GBD)(SN).

2. The sources of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm's representation of the *Burnett* Plaintiffs in connection with their claims arising out of the terrorist attacks on September 11, 2001, and conversations with these plaintiffs and other family members of these plaintiffs. Any matters about which I lack Personal knowledge are asserted herein upon information and belief.

3. Attached hereto as Exhibit A is a list of the plaintiffs to be added to the pending litigation in this case against the Taliban.

4. Each of the plaintiffs listed on Exhibit A have claims in this case against the Kingdom of Saudi Arabia and/or have claims against the Islamic Republic of Iran in other litigation within this MDL being pursued by Motley Rice LLC.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Parties Against the Taliban by amendment or supplementation or in the alternative, intervention.

Dated: May 15, 2025

Respectfully submitted,

MOTLEY RICE LLC

/s/ John C. Duane

John C. Duane, Esq.

Donald A. Migliori, Esq.

Jodi Westbrook Flowers, Esq.

Robert T. Haeefe, Esq.

28 Bridgeside Boulevard

Mount Pleasant, SC 29464

Tel: (843) 216-9000

Fax: (843) 216-9450

Email: jduane@motleyrice.com

Attorneys for the *Burnett* Plaintiffs